

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY  
CORPORATION, *as assignee of  
individuals who are covered persons,*  
JANE DOE-1, *a law enforcement officer,*  
JANE DOE-2, *a law enforcement officer,*  
EDWIN MALDONADO, SCOTT  
MALONEY, JUSTYNA MALONEY, and  
WILLIAM SULLIVAN,

Plaintiffs,

v.

CONSTELLA INTELLIGENCE, INC.,  
RICHARD ROES 1–10, *fictitious names  
of unknown individuals* and ABC  
COMPANIES 1–10, *fictitious names of  
unknown entities,*

Defendants.

Case No. 2:24-cv-10571

**APPLICATION FOR CLERK’S ORDER  
EXTENDING TIME UNDER LOCAL RULE 6.1(b)**

Constella Intelligence, Inc. (“Constella”) hereby applies for a Clerk’s Order under Local Rule 6.1(b) extending by 14 days the time within which Constella may answer, move, or otherwise respond to the Complaint filed by Plaintiffs herein. (*See* ECF No. 1.) Constella represents that:

1. Constella has not sought, or obtained, a previous extension of time to answer, move, or otherwise respond to the Complaint.

2. Constella removed this above-captioned action to this Court on November 18, 2024.
3. Under Federal Rule of Civil Procedure 81(c)(2) and Federal Rule of Civil Procedure 6(a)(1)(C), the time to answer, move, or otherwise respond to the Complaint expires on November 25, 2024.
4. Constella respectfully requests a 14-day extension of time within which to answer, plead, or otherwise respond to the Complaint—*i.e.*, until December 9, 2024.

Dated: November 22, 2024

Respectfully Submitted,

/s/ Lauri A. Mazzuchetti

Lauri A. Mazzuchetti

Whitney M. Smith

Aaron J. Gold

KELLEY DRYE & WARREN LLP

One Jefferson Road, 2nd Floor

Parsippany, NJ 07054

Tel: (973) 503-5900

Fax: (973) 503-5950

lmazzuchetti@kelleydrye.com

wsmith@kelleydrye.com

agold@kelleydrye.com

*Counsel for Defendant*

*Constella Intelligence, Inc.*

**ORDER**

The application is ORDERED GRANTED; the time within which defendant Constella must answer, move or otherwise respond to the Complaint is extended to December 9, 2024.

Dated: \_\_\_\_\_, 2024

By: \_\_\_\_\_  
Deputy Clerk